

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVEN SCHMALZ, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

MBIA, INC., GARY C. DUNTON and C.
EDWARD CHAPLIN,

Defendants.

Civil Action No. 08-CV-0264 (KMK)

ECF CASE

TEAMSTERS LOCAL 807 LABOR
MANAGEMENT PENSION FUND,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

MBIA, INC., GARY C. DUNTON, C.
EDWARD CHAPLIN and JOSEPH W.
BROWN,

Defendants.

Civil Action No. 08-CV-1845

Caption continues on the following page.

GARY KOSSEFF, individually and on
behalf of all other similarly situated,

Plaintiff,

v.

MBIA, INC., GARY C. DUNTON, AND
C. EDWARD CHAPLIN,

Defendants.

Civil Action No. 08-CV-2362

**LOUISIANA MUNICIPAL POLICE EMPLOYEES' RETIREMENT SYSTEM'S
MOTION FOR APPOINTMENT AS LEAD PLAINTIFF,
APPROVAL OF ITS SELECTION OF LEAD COUNSEL FOR THE CLASS,
AND CONSOLIDATION OF ALL RELATED ACTIONS**

Louisiana Municipal Police Employees' Retirement System ("MPERS"), by their counsel, hereby respectfully moves this Court to: (i) consolidate all related actions; (ii) be appointed Lead Plaintiff in the consolidated securities class action; and (iii) approve their selection and retention of Berman DeValerio Pease Tabacco Burt & Pucillo as Lead Counsel.

In support of this Motion, MPERS submits herewith a Memorandum of Law, the Declaration of Leslie R. Stern, and a Proposed Order.

Dated: March 11, 2008

Respectfully submitted,

By: /s/ Todd S. Garber
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*Local Counsel for MPERS and Proposed
Lead Counsel for the Class*

-and-

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